

EXHIBIT 6

RYAN GERMANY
FAIR FIGHT ACTION vs RAFFENSPERGER

December 11, 2019

1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION
4

5 CASE NUMBER: No. 1:18-CV-05391-SCJ
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7 FAIR FIGHT ACTION, INC; CARE IN ACTION, INC;
8 EBENEZER BAPTIST CHURCH OF ATLANTA, GEORGIA,
9 INC.; BACONTON MISSIONARY BAPTIST CHURCH, INC;
10 VIRGINIA-HIGHLAND CHURCH, INC.; and THE SIXTH
11 EPISCOPAL DISTRICT, INC.,
12 Plaintiffs,

13 vs.

14 BRAD RAFFENSPERGER, in his official capacity
15 as Secretary of State of the State of Georgia
16 and as Chair of the State Election Board of
17 Georgia; REBECCA N. SULLIVAN, DAVID J. WORLEY,
18 and SETH HARP, in their official capacities as
19 members of the STATE ELECTION BOARD; and STATE
20 ELECTION BOARD,
21 Defendants.

22 VIDEOTAPED DEPOSITION
23

24 OF
25

RYAN GERMANY

December 11, 2019

26 REPORTED BY:

27 J. Ashley Arrowood, RPR, CRR

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1 Q. Okay. All right. There's a big
2 controversy about using money from the
3 Department of Homeland Securities to secure --
4 or to look at the security of the DRE
5 machines. Tell me what you know about that.

6 A. I'm not aware of any money that
7 Homeland Security has offered.

8 Q. Is that right, DHS did not offer
9 the State any money or assistance for --

10 A. So they did offer states some
11 services after -- I guess after the 2016
12 election.

13 Q. Yeah.

14 A. We looked at it at the time in
15 terms of what they were offering and -- "we"
16 being our office -- and came to the
17 conclusion that we're already doing all of
18 this.

19 We had a data release in 2015
20 where we inadvertently mailed out electors
21 list that included private information.

22 Q. Yeah.

23 A. So the silver lining in that --
24 and we -- I think it kind of put us ahead of
25 the game on adopting cybersecurity practices.

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1 They needed to be adopted.

2 So when we -- when DHS
3 offered -- they offered some assessments. We
4 spoke to DHS, I believe -- I know I
5 specifically spoke to people at DHS about,
6 hey, here's what we're doing, how does what
7 you're doing work with this, and their -- I
8 don't remember specifically who I spoke to,
9 but the response was you're -- that's just as
10 good as what we're going to do, frankly it's
11 good, and we can go work on a state that's
12 not doing anything.

13 So now we do use -- you know,
14 since then, I think they've offered some
15 things that were -- that we did see as
16 beneficial, and we've added those into
17 different parts of our system.

18 Q. You do understand the importance
19 of citizens having confidence in the voting
20 process, don't you?

21 A. I think that's very important.

22 Q. Were you concerned that there
23 would be a perception that if you turned down
24 DHS assistance that people may lose
25 confidence?

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1 MR. RUSSO: John, he's not
2 speaking as a 30(b)(6) for the office. Are
3 you asking -- you know, you said were you
4 concerned that there would be a perception if
5 you turned down DHS assistance.

6 MR. CHANDLER: Substitute
7 Secretary of State's office.

8 MR. RUSSO: Well, I don't know if
9 that cures the issue because he's not a
10 30(b)(6).

11 If you know, then you can go ahead
12 and speak to it personally but --

13 Q. (BY MR. CHANDLER:) Tell me what
14 you know.

15 MR. RUSSO: I don't think he can
16 respond for the office.

17 A. So my impression is that we are
18 definitely concerned about voter confidence
19 and a voter having confidence in the system.
20 I don't think there was a concern around that
21 about the DHS issue specifically.

22 Q. (BY MR. CHANDLER:) Okay. Have
23 you done anything to determine whether the DRE
24 machines were hacked in connection with the
25 2018 election?